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800 RESPONSE INFORMATION SERVICES LLC

September 6, 2005

Docketing Department
Public Service Commission of South Carolina
P.O. Drawer 11649
Columbia, SC 29211

RE: DOCKET NO. 2005-139-C – 800 Response Information Services LLC –
Application for a Certificate of Public Convenience and Necessity to Provide
Long Distance Telecommunications Services and for Alternative Regulation of its
Long Distance Services

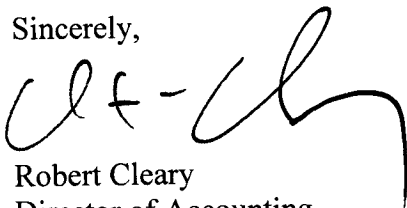
Dear Docketing Department:

Enclosed please find an original and 25 copies of the Direct Testimony of Linda Young
on behalf of 800 Response Information Services LLC in the above-referenced matter.

Please acknowledge receipt of this filing by returning, file-stamped, the extra copy of this
cover letter in the self addressed stamped envelope provided for that purpose.

Please feel free to contact me if you have any questions regarding the enclosed document.

Sincerely,



Robert Cleary
Director of Accounting

Enclosure

CC: Benjamin P. Mustian

RECEIVED

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*OK postmarked
OK D. Duke*

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

APPLICATION OF 800 RESPONSE INFORMATION)
SERVICES LLC FOR A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY TO)
PROVIDE RESOLD LONG DISTANCE) DOCKET NO. 2005-139-C
TELECOMMUNICATIONS SERVICES)
AND FOR ALTERNATIVE REGULATION OF ITS)
LONG DISTANCE SERVICE OFFERINGS)

DIRECT TESTIMONY OF LINDA YOUNG

I. Introduction

Q. Please state your name, address and occupation.

A. **My name is Linda Young. My business address is 200 Church Street, Burlington, Vermont, 05401. I am the Director of Operations of 800 Response Information Services LLC (“800 Response IS”).**

Q. What is the purpose of your testimony?

A **The purpose of my testimony is to describe the services and operations of 800 Response IS in support of its application for a Certificate of Public Convenience and Necessity and its initial proposed tariff.**

II. Business of 800 Response IS

Q. Please explain the nature of 800 Response IS’ business.

A. **800 Response IS, a Vermont limited liability company, is a long distance reseller of telecommunications services. Specifically, 800 Response IS provides inbound “800” toll free services. It is currently authorized or otherwise permitted**

to provide resale of these services in approximately thirty-five states and is in the process of applying for the required authorizations in the remaining states.

Q. Please describe 800 Response IS' system and what facilities are used by 800 Response IS in the provision of its services.

A. **As I have already mentioned, 800 Response IS is a resale provider.**

Applicant's only facilities will be a switch in an MCI co-location facility in Billerica, Massachusetts. Other than the switch, Applicant will be reselling MCI's interexchange services. With the exception of the switch, all of 800 Response IS' operations are run out of its office in Burlington, Vermont. 800 Response IS does not have any facilities, offices or personnel in South Carolina.

Q. Has 800 Response IS registered to do business in South Carolina?

A. **Yes. The South Carolina Secretary of State's Office issued a Certificate of Authorization to 800 Response IS dated March 2, 2005. A copy of the certificate is attached to our application as Exhibit A.**

Q. What intrastate services does 800 Response IS intend to offer to customers in South Carolina?

A. **800 Response IS intends to provide inbound "800" toll free services to non-residential customers throughout the state of South Carolina.**

Q. How does your company deal with consumer complaints?

A. **Customers will be able to call 800 Response IS at a toll free customer service number, which will be printed on the customers' monthly billing statements. The company's customer service representatives will be prepared to respond to a broad range of service matters, including inquiries regarding the types of services offered**

by 800 Response IS and its rates, billing questions, and any problems or concerns the customer may have. Each complaint will be fully investigated and resolved as soon as possible. 800 Response IS also provides a web site, as well as an address to which customers may write for rate and service information.

Q. Please describe the proposed 800 Response IS South Carolina tariff.

A. 800 Response IS has included a proposed interexchange tariff which contains the rule, regulations and rates for its services and is attached to the Application as Exhibit F.

III. Managerial, Technical, and Financial Qualifications

Q. In your opinion, does 800 Response IS have the managerial ability to operate the proposed system in South Carolina?

A. Yes. Please see the resumes of 800 Response IS' key management team, which are attached as Exhibit D to our application, which reflect substantial management and telecommunications experience.

Q. Please describe 800 Response IS' technical ability to operate the system in question.

A. 800 Response IS will rely upon the technical expertise of its underlying carrier. 800 Response IS's management team, as indicated in Exhibit D to the application, also has significant technical experience.

Q. Please summarize the financial condition of 800 Response IS.

A. 800 Response IS is a new company that commenced operations on July 1, 2005. 800 Response is already doing business in other States, and has assets, primarily switching equipment, exceeding \$200,000. The company is cash-flow

positive from existing operations. There is no incremental cost of doing business in South Carolina because all calls will be carried over the same switching equipment that is already in use. The underlying carriage of traffic will be provided by MCI, for which 800 Response pays per minute rates, but incurs no capital requirement. Attached as Exhibit C to 800 Response IS' application is a copy of the projected income statement and balance sheet for 2005.

V. Pubic Interest

Q. What positive benefits would flow to the public in South Carolina from the certification of 800 Response IS?

A. 800 Response IS' provision of resold inbound "800" toll-free services to non-residential customers will serve the public interest by providing a competitive alternative to South Carolina customers. It will promote, through competition, the efficient use of current and future telecommunications networks in South Carolina. Customers will benefit by having an additional alternative carrier from which to choose, and from general improvements in price, billing options, features and other options that are generated by competitive pressures. 800 Response IS anticipates that its proposed services will provide its subscribers with better quality services and will increase choice through innovative, diversified and reliable service offerings.

Q. Please summarize your testimony.

A. 800 Response IS has demonstrated the managerial, technical and financial ability to provide services in the State of South Carolina. 800 Response IS believes

that its proposed services and the quality of the service that it intends to offer will benefit consumers in South Carolina and is therefore in the public interest.

Q. Are you familiar with the matters set forth in this Application filed in this Case?

A. **Yes.**

Q. Are the statements contained in the Application true and correct to the best of your current knowledge, information and belief?

A. **Yes.**

Q. Do you accept the matters set forth in the Application as your additional testimony in this Case?

A. **Yes.**

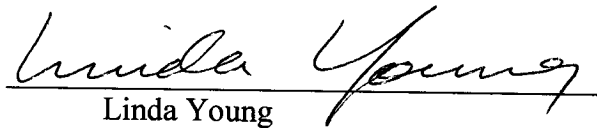
Q. Does this conclude your testimony?

A. **Yes.**

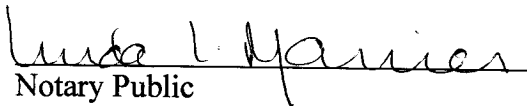
VERIFICATION

STATE OF VERMONT)
COUNTY OF CHITTENDEN)

I, Linda Young, being duly sworn, declare that I am the Director of Operations of 800 Response Information Services LLC, the Applicant. I verify that, based upon current information and belief, I have knowledge of the statements in the foregoing Direct Testimony, and I declare that they are true and correct.


Linda Young

Subscribed and sworn to before me
this 6th day of September, 2005


Notary Public

My Commission Expires: 2-10-07